

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MIHAIL SLAVKOV, et al.,
Plaintiffs,

v.

FAST WATER HEATER PARTNERS I,
LP, et al.,
Defendants.

Case No. 14-cv-04324-JST

**CORRECTIVE NOTICE REGARDING
INVALIDATION OF RELEASES**

CORRECTIVE NOTICE REGARDING INVALIDATION OF RELEASES

You are receiving this notice by order of the Court in the above matter. Please read this notice carefully as it contains important information about your legal rights.

THIS LAWSUIT

As you may know, Plaintiffs Mihail Slavkov, Martin Arnaudov and Nikola Vlaovic (collectively called “the Plaintiffs”) filed a lawsuit against the Fast Water Heater Company and other defendants (the various defendants are collectively referred to as “Fast Water Heater”). The Plaintiffs allege that Fast Water Heater violated various provisions of the Fair Labor Standards Act, the Federal Credit Reporting Act, the California Labor Code and the California Investigative Consumer Reporting Agencies Act. Their claims include failure to pay minimum and overtime wages, failure to pay wages due upon termination, improper wage deductions, failure to provide accurate wage statements, failure to reimburse business expenses, failure to provide sick leave, improper background check authorization forms, and “unfair business practices.” The Plaintiffs are seeking to represent a class of current and former Fast Water Heater employees, which may include you. Fast Water Heater denies the allegations made by Plaintiffs.

THE COURT INVALIDED THE FAST WATER HEATER RELEASES

In August, 2015, you may have received a letter from Perkins Coie LLP, counsel for Fast

1 Water Heater, regarding an “Offer to Settle Potential Claims Raised in Slavkov Litigation.” The
2 letter included a check and a document titled “Voluntary Settlement and Release of Claims”
3 (which shall be referred to as “the Release”). You may also have received a follow up letter from
4 Perkins Coie LLP in September, 2015.

5 The Plaintiffs challenged the validity of the Release in Court. On November 2, 2015, the
6 Court issued an order invalidating the Release. That means that the Release is not binding on you
7 or on the parties. The Court decided that language in the Release about confidentiality and
8 participation in the *Slavkov* action was “misleading and potentially harmful” because it could
9 leave the incorrect impression that anyone accepting the offer to settle cannot speak with
10 Plaintiffs’ counsel about the events surrounding the class action.

11 In addition, the Court decided that the Release was misleading because you were not told
12 that some of the claims asserted by Plaintiffs on your behalf can only be released with the
13 approval of the Court.

14 YOUR RIGHTS

15 If you signed the Release and/or cashed the check sent to you by Perkins Coie LLP, you
16 are not bound by the Release. The claims asserted on your behalf by the Plaintiffs have not been
17 affected. If a class is certified or Plaintiffs are permitted to pursue claims as your representatives
18 or if you elect to join the suit, you will be part of the litigation. You do not need to do anything in
19 response to this Notice, and you are not required to return any money you may have received in
20 connection with the invalidated Release. You may participate as a witness in this action and, if
21 you choose, you are permitted to speak with Plaintiffs’ attorneys.

22 COMMUNICATIONS WITH THE ATTORNEYS

23 You are free to communicate with the attorneys for the Plaintiffs and with the attorneys for
24 the Defendants or with another attorney of your choice. Nothing in the invalidated Release affects
25 your right to communicate with counsel for either side.

26 Plaintiffs in this action are represented by the following attorneys:

27 Woodall Law Offices
28 Kevin Woodall (kevin@kwoodalllaw.com)

1 100 Pine Street, Suite 1250
2 San Francisco, CA 94111
Direct: (415) 413-4629

3 Douglas Law Offices
4 John Douglas (jdouglas@douglaslegal.com)
5 100 Pine Street, Suite 1250
San Francisco, CA 94111
Direct: (415) 794-4751

6 Barnes Law Offices
7 Page Barnes (page@pbarneslaw.com)
8 580 California St., 16th Floor
Direct: (415) 231-6110

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10 Defendants in this action are represented by the following attorneys:

11 Perkins Coie LLP
12 Sue Stott (sstott@perkinscoie.com)
Jonathan Longino (jlongino@perkinscoie.com)
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15 **Phone:**(415) 344-7000

16 If you have questions about this notice, please contact one of the counsel listed above. Do not
17 contact the court.
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